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June 3, 2021

**VIA ECF**

Hon. Peggy Kuo  
United States Magistrate Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Miller, et al. v. Arab Bank, PLC, No. 18-cv-2192 (RPK) (PK)***  
***Pam, et al. v. Arab Bank, PLC, No. 18-cv-4670 (RPK) (PK)***

Dear Magistrate Judge Kuo:

We submit this joint letter in the above-referenced actions in response to the Court’s May 3, 2021 Order directing the parties to file a further joint status report by June 8, 2021. The parties conferred on May 27, 2021 and offer the following update.

***A. The Status of the Miller and Pam Plaintiffs’ Document Productions***

As Plaintiffs previously advised the Court, Plaintiffs are continuing to identify and/or produce documents on a rolling basis that are responsive to Arab Bank’s discovery requests and are working with vendors in the U.S. and Israel to obtain electronically stored information (“ESI”) responsive to Arab Bank’s discovery requests.

***B. The Status of Defendant’s Document Production***

Defendant has completed its document production responsive to Plaintiffs’ First and Second Document Requests other than those documents subject to the bank privacy laws of the Kingdom of Jordan (“Jordan”), the Palestinian National Authority (“PNA”), and the Republic of Lebanon (“Lebanon”). As previously reported, the parties are awaiting decisions from the Palestinian and Jordanian Authorities on the Letters Rogatory.

***C. The Parties’ Proposal for Addressing Outstanding Discovery Issues***

In their most recent meet and confer, the parties discussed the discovery that remains outstanding as well as both the progress and issues each side has faced, particularly with respect to foreign discovery from Plaintiffs living abroad and responses to the Letters Rogatory. With the Court’s permission, the parties agree that they should next meet and confer on August 2, 2021, to discuss the status of any still outstanding discovery requests and report to the Court regarding same no later than August 9, 2021.

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The parties further agree to advise the Court prior to that date should either party require the Court's intervention to resolve any dispute regarding the outstanding discovery or to report on any significant developments warranting the Court's immediate attention.

The parties believe that the schedule proposed herein is reasonable in light of developments abroad and request that the Court adopt it. Should the Court wish any further information regarding the parties' proposal or additional information regarding the discovery completed to date, the parties will of course respond or otherwise make themselves available at the Court's convenience.

Respectfully submitted,

/s/ Ari Ungar

cc: All Counsel